

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ANDREW LEE FLOWERS, JR.,)	
)	
Plaintiff,)	
vs.)	No.: 19 CV 06423
)	
WEXFORD HEALTH SOURCES, INC.;)	
PATRICIA BURKE, M.D., sued in her)	
Individual capacity; CLAUDE OWIKOTI,)	
Sued in his individual capacity; MICHAEL)	
RUSSELL, O.D., sued in his individual)	Honorable Robert W. Gettleman
Capacity; KRISTA HYATT-TORRES,)	
Sued in her individual capacity; DEBORAH)	
MCCALLUM, sued in her individual)	
capacity; JESSICA ORTEGON, sued in her)	Honorable Jeffrey T. Gilbert
individual capacity; VICTORIA PLUMMER,)	
sued in her individual capacity; MELISSA D.)	
LAMESCH, sued in her individual capacity; and)	
JOHN DOES, currently unknown employees of)	
the Illinois Department of Corrections or Wexford)	
Health Sources, Inc.,)	
)	
Defendants.)	

NOVEMBER 18, 2020 JOINT STATUS REPORT

Pursuant to the Court's Order (Dkt. #91) the parties report as follows concerning providing the dates for the individual Defendants' depositions and for Plaintiff's service of the 30(b)(6) notice on Wexford.

The parties have agreed on the following dates for the Defendants' depositions:

1. Dr. Burke – January 20, 2021
2. Mr. Owikoti – January 14, 2021
3. Dr. Russell – January 27, 2021
4. Ms. Hyatt-Torres – January 22, 2021

5. Mr. Ortegon – January 6, 2021

6. Ms. Plummer – January 12, 2021

Defendants' McCallum and Lamesch are yet to be scheduled. However, counsel for these defendants expect to provide suggested dates by the second week of December and the parties will update the Court shortly thereafter.

Based on the above schedule, and assuming that the last two individual defendants' depositions can be scheduled by the second week of February, Plaintiff will serve a 30(b)(6) deposition notice on Wexford by February 11, 2021.

7. Counsel for Wexford has stated that will try to schedule the 30(b)(6) depositions of Wexford within 30-45 days of receiving the 30(b)(6) deposition notice.

By: /s/Katelyn Somin Jun
Robert S. Tengesdal
Katelyn Somin Jun
Connolly Krause LLC
500 W. Madison St., Suite 2430
Chicago, Illinois 60661
(312) 253-6200
rtengesdal@cktrials.com
kjun@cktrials.com

*Attorneys for Melissa Lamesch, Claude
Owikoti, Wexford Health Sources, Inc., Jessica
Ortegon and Victoria Plummer*

By: /s/Aaron A. Barlow
Aaron A. Barlow
Jenner & Block LLP
353 N. Clark St.
Chicago, Illinois 60654-3456
(312) 222-9350
abarlow@jenner.com

Attorney for Plaintiff

By: /s/Deborah A. Benzing
Deborah A. Benzing
Law Office of Meachum, Boyle, Trafman,
Marek & Parker
225 W. Washington St., Suite 500
Chicago, Illinois 60606
(312) 726-6317
deborah.benzing@libertymutual.com

By: /s/John J. Reid
John J. Reid
Cassiday Schade LLP
222 W. Adams St., Suite 2900
Chicago, Illinois 60606
(312) 641-3100
jreid@cassiday.com

Attorney for Defendant, Michael Russell, O.D.

*Attorney for Patricia Burke,
M.D.*

By: /s/Helen A. Lozano
Helen A. Lozano
Office of the Illinois Attorney General
100 W. Randolph St., 13th Floor
Chicago, Illinois 60601
(312) 814-6594
hlozano@atg.state.il.us

*Attorney for Krista Hyatt-Torres and
Deborah McCallum*

CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2020, I caused the foregoing to be uploaded to the court's CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Aaron A. Barlow
Aaron A. Barlow